

MICHAEL N. FEUER, City Attorney (SBN 111529)
SCOTT MARCUS, Chief Assistant City Attorney (SBN 184980)
GABRIEL S. DERMER, Assistant City Attorney (SBN 229424)
ARLENE N. HOANG, Deputy City Attorney (SBN 193395)
JOSEPH S. PERSOFF, Deputy City Attorney (SBN 307986)
200 North Main Street, City Hall East, Suite 675
Los Angeles, California 90012
Telephone: 213-978-7508
Facsimile: 213-978-7011
Email: Arlene.Hoang@lacity.org;
Joseph.Persoff@lacity.org

Attorneys for Defendants
CITY OF LOS ANGELES
(also erroneously sued as the Office of Wage
Standards for the City of Los Angeles) and
ERIC GARCETTI, in his official capacity as
Mayor of Los Angeles

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BARLOW RESPIRATORY HOSPITAL,
at al.;

Plaintiffs,

v.

CITY OF LOS ANGELES; OFFICE OF
WAGE STANDARDS FOR THE CITY
OF LOS ANGELES; ERIC GARCETTI,
in his official capacity as Mayor of Los
Angeles; and DOES 1-20,

Defendants.

Case No. 2:22-CV-04828-JLS-GJS

**SECOND STIPULATION TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

Complaint served: July 15, 2022
Current response date: Sept. 6, 2022
P.I. hearing date: Sept. 16, 2022
Proposed new response date: Oct. 6,
2022

1 WHEREAS, Defendants City of Los Angeles (also erroneously sued and served as
2 the Office of Wage Standards for the City of Los Angeles) and Eric Garcetti
3 (“Defendants”) were served with a copy of Plaintiffs’ summons and Complaint on July
4 15, 2022;

5 WHEREAS, Plaintiffs’ Motion for Preliminary Injunction was initially set for
6 hearing on August 5, 2022, the same date Defendants’ response to the Complaint was
7 due;

8 WHEREAS, pursuant to Local Rule 8-3, the parties stipulated to extend the time
9 for Defendants to respond to the Complaint for 30 days until September 6, 2022, due to
10 the 30th day falling on Sunday, September 4, 2022, and the 31st day falling on Labor
11 Day, September 5, 2022;

12 WHEREAS, a referendary petition was submitted to the Los Angeles City Clerk
13 on August 10, 2022, and if the Clerk certifies the petition, Los Angeles Ordinance No.
14 187566, the constitutionality of which is the subject of this litigation, would not take
15 effect unless adopted by voters at a future election;

16 WHEREAS, in light of the Los Angeles City Clerk’s receipt of the referendary
17 petition, the hearing on Plaintiffs’ Motion for Preliminary Injunction was continued to
18 September 16, 2022 (Dkt. 33);

19 WHEREAS, the result of the Los Angeles City Clerk’s review of the referendary
20 petition and the outcome of the hearing on Plaintiffs’ Motion for Preliminary Injunction
21 may impact the nature of Defendants’ response to the Complaint, or even the need for
22 one at all; therefore, continuing the deadline for Defendants’ response to the Complaint
23 would further the interests of judicial economy and avoiding the unnecessary
24 expenditure of the Court’s and the Parties’ resources.

25 NOW THEREFORE, the Parties, through their respective counsel of record,
26 stipulate that good cause supports continuing Defendants’ deadline to respond to
27
28

1 Plaintiffs' Complaint and respectfully request the Court continue Defendants' deadline
2 to the respond to Plaintiffs' Complaint from September 6, 2022 to October 6, 2022.

3
4 It is so stipulated.

5 DATED: August 17, 2022

Respectfully submitted,

6 MICHAEL N. FEUER, City Attorney
7 SCOTT MARCUS, Chief Assistant City Attorney
8 GABRIEL S. DERMER, Assistant City Attorney
9 **ARLENE N. HOANG, Deputy City Attorney**
JOSEPH S. PERSOFF, Deputy City Attorney

10 By: /s/ Joseph S. Persoff

11 Joseph S. Persoff, Deputy City Attorney
12 Attorneys for Defendants

13 DATED: August 17, 2022

GIBSON, DUNN & CRUTCHER LLP

14 By: /s/ Maurice Suh

15 Maurice Suh
16 Jeremy S. Smith
17 Andrew M. Kasabian
18 Patrick J. Fuster
Attorneys for Plaintiff California Hospital Association

19 DATED: August 17, 2022

BELL, MCANDREWS & HILTACHK, LLP

20 By: /s/ Thomas W. Hiltachk

21 Thomas W. Hiltachk
22 Brian T. Hildreth
23 Paul T. Gough
24 Attorneys for Plaintiffs Barlow Respiratory Hospital;
25 PIH Health Good Samaritan Hospital; Providence Holy
26 Cross Medical Center; Hospital Association of Southern
27 California
28

ECF ATTESTATION

I, Joseph S. Persoff, attest pursuant to C.D. Local Rule 5-4.3.4(a)(2) that the concurrence in the filing of this document has been obtained by the above signatories.

DATED: August 17, 2022

/s/ Joseph S. Persoff

Joseph S. Persoff